

KELLOGG, HANSEN, TODD, FIGEL & FREDERICK, P.L.L.C.

SUMNER SQUARE
1615 M STREET, N.W.
SUITE 400
WASHINGTON, D.C. 20036-3215

(202) 326-7900

FACSIMILE:
(202) 326-7999

May 24, 2021

Via ECF

The Honorable Sarah Netburn
Thurgood Marshall United States Courthouse
40 Foley Square, Room 430
New York, NY 10007

Re: *In re Terrorist Attacks on September 11, 2001*, 03-md-1570 (GBD) (SN)

Dear Judge Netburn:

As directed by the Court's order by memorandum endorsement of April 26, 2021, ECF No. 6762, I write on behalf of Defendant Kingdom of Saudi Arabia ("Saudi Arabia") to bring the Court up to date on the status of the parties' efforts to propose redactions in accordance with the Court's order of November 24, 2020, ECF No. 6541. The Plaintiffs' Executive Committees ("Plaintiffs"), the Federal Bureau of Investigation ("FBI"), and Defendant Dallah Avco all join in this letter.

Saudi Arabia is in the final stages of preparing proposed redactions for the sealed filings leading up to the Court's May 27 and June 23, 2020 orders, and it expects to be able to circulate those proposed redactions later this week. Saudi Arabia is also still awaiting a response from counsel for the King Fahad Mosque and witnesses Khalil Al Khalil and Osman Kaldirim regarding whether they will propose any redactions to the sealed filings leading up to the Court's January 7, April 27, and May 7, 2020 orders.

As set forth in the parties' April 23, 2021 letter, ECF No. 6761, Plaintiffs have completed their review of the sealed filings leading up to the Court's January 7, April 27, May 7, May 27, August 11, August 27, and October 2, 2020 orders for information subject to the FBI protective order and have circulated proposed redactions to Saudi Arabia and to the FBI.

FBI continues to review the parties' proposed redactions to the sealed filings leading up to the Court's November 25, 2019 and January 3, 2020 orders, and it expects to complete that review and propose any additional redactions to those motion papers shortly.

Counsel for all parties will continue to work to move this process forward. Subject to the Court's approval, we propose to submit another joint status letter on or before June 23, 2021.

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Respectfully submitted,

/s/ Michael K. Kellogg

Michael K. Kellogg
Counsel for the Kingdom of Saudi Arabia

cc: All MDL Counsel of Record (via ECF)